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March 12, 2015

Freeman, et al. v. HSBC Holdings plc, et al.,  
14-CV-6601 (DLI)(CLP)

Dear Judge Irizarry:

We represent defendant Credit Suisse AG in the above-referenced matter. Pursuant to Rule IV.C of Your Honor's individual rules, we respectfully submit this letter, with the consent of counsel for all parties, to request leave of Court to modify the Court's page limits for memoranda of law in regard to the defendants' motions to dismiss, which are due on Monday, March 16, 2015.

While there are numerous defendants named in this matter, the parties have streamlined the briefing process and are proposing page limits that involve fewer total pages, in the aggregate, than Your Honor's individual rules would provide were each defendant separately to submit a motion to dismiss. Specifically, defendants respectfully propose, and plaintiffs do not object to, the following:

Defendants' Motions to Dismiss

- A joint motion to dismiss, submitted by defendants HSBC Holdings plc, HSBC Bank plc, HSBC Bank Middle East Limited, HSBC Bank USA, N.S., Barclays Bank PLC, Standard Chartered Bank, The Royal Bank of Scotland N.V., and Credit Suisse AG, not to exceed 30 pages, with each of these defendants also being permitted to submit an individual brief not to exceed 10 pages each.
- A motion to dismiss to be submitted separately by defendant Bank Saderat PLC, not to exceed 30 pages.

Plaintiffs' Opposition

- Plaintiffs will have a total number of pages for their opposition briefing up to the total number of pages of all of the motion to dismiss memoranda submitted by the

defendants. Upon reviewing the motions to dismiss, plaintiffs' counsel will assess the most efficient means of responding (i.e., either via one omnibus opposition memorandum or through separate briefs as to some or all of the motions to dismiss).

Defendants' Reply

- A joint reply brief, submitted by defendants HSBC Holdings plc, HSBC Bank plc, HSBC Bank Middle East Limited, HSBC Bank USA, N.S., Barclays Bank PLC, Standard Chartered Bank, The Royal Bank of Scotland N.V., and Credit Suisse AG, not to exceed 20 pages, with each of these defendants also being permitted to submit an individual reply brief not to exceed 5 pages each.
- A reply brief to be submitted separately by defendant Bank Saderat PLC, not to exceed 20 pages.

Thank you for the Court's consideration.

Respectfully submitted,

/s/ John D. Buretta  
John D. Buretta

The Honorable Dora L. Irizarry  
United States District Judge  
United States District Court  
Eastern District of New York  
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VIA ECF

Copies to:

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